

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

FAMILY DOLLAR, INC.,

Plaintiff,

v.

**AMERICAN ARBITRATION
ASSOCIATION, INC.,**

Defendant.

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Case No. _____

COMPLAINT

EXHIBIT B

From: Beth Berman </O=DOLLARTREE/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BBERMAN.DOLLARTREE.COM>
Sent: Thursday, November 21, 2019 8:09 PM
To: AAA Heather Santo
Cc: AAA Patrick Tatum; [REDACTED]
Subject: [REDACTED] arbitrations

Dear Ms. Santo,

While we continue to believe that none of the arbitration demands sent by [REDACTED] meets AAA's minimum filing requirements and further believe that the November 1, 2019 fee schedule should be applied to these demands, in order to move these arbitrations along Family Dollar will pay the \$2,200 per case filing fee for each of the individuals identified on Exhibit B to [REDACTED] November 8, 2019, correspondence with the exception of the following individuals.

Individuals whose arbitration agreements provide for arbitration before JAMS, not AAA:

[REDACTED]

[REDACTED]

Individuals who are barred by their bankruptcy filings:

[REDACTED]

Individual who released the company from all employment related claims in 2018, after her employment with the company had ended:

[REDACTED]

That would leave 1166 claimants on the list. Please advise whether this is acceptable to AAA. If it is, Family Dollar will forward a check in the amount of \$2,565,200 to AAA. We also request, to the extent some of these cases never go forward, that AAA refund the filing fee for those cases in whole or in part.

Thank you.

Respectfully,
Beth Hirsch Berman
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